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STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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2003 DEC 15 P 12:55

**WORKING ASSETS FUNDING SERVICE, INC.**

Application to Expand Its Certificate Of Authority  
To Include Authority to Operate as a Reseller of  
Local Exchange Telecommunications Services in the  
State of Illinois

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)  
) CHIEF CLERK'S OFFICE  
) Docket No. 03-0761  
)  
)

**WORKING ASSETS MOTION FOR PROTECTIVE ORDER**

Working Assets Funding Service, Inc. by its consultant, pursuant to Rule 200.430 of the Commission's rules of practice, 83 Ill. Adm. Code 5 200.430, hereby **requests** that the Commission file under seal, and retain as confidential, certain information submitted in support of its Application to Expand Its Certificate Of Authority to Include Authority to Operate as a Reseller of Local Exchange Telecommunications Services ("Application.") In support of its Motion, Working Assets states as follows.

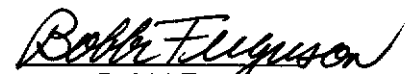
1. On December 15, 2003, Working Assets filed its Application. In support of the Application, Working Assets submitted confidential information at Attachment F and Attachment G to the Application. Working Assets considers the financial information at Exhibit F and the chart of accounts at Exhibit G to be highly proprietary, confidential, and trade secret information. This information is not publicly available and disclosure to competitors or potential competitors would be detrimental to Working Assets. Copies of these Attachments are included with this Motion in separate envelopes.
2. Rule 200.430 of the Commission's Rules of Practice provide that the Commission may enter an order to protect confidential, proprietary or trade

secret information. 83 I11.Adm.Code 5 200.430. Rule 200.430@) further provides that the Commission may provide for the protection of confidential information for up to five years, and for a period beyond that upon a showing of good cause.

3. Working Assets requests that the Commission enter a Protective Order to retain Attachments F and G to the Application for a period expiring on December 31, 2004. This time is necessary to protect the confidential information contained in the attached manual. Included among the information in the manual are guidelines used by Talk America to resolve and issue credits with customers. Working Assets America has no objection to the ICC Staff reviewing this information, but does not want this information to be made publicly available.

Wherefore, for each of the foregoing reasons, Working Assets requests that the Commission enter a Protective Order allowing Attachments F (Financial Information) and G (Chart of Accounts) to be retained under seal with the Commission.

Respectfully submitted,



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Consultant to

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